

ORIGINAL  
FILE

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of

Amendment of the Commission's  
Rules to Establish New Personal  
Communications Services

) GEN Docket No. 90-314  
) ET Docket No. 92-100  
)  
) RM-7140, RM-7175, RM-7616,  
) RM-7618, RM-7760, RM-7782,  
) RM-7860, RM-7977, RM-7978,  
) RM-7979, RM-7980  
)  
) PP-35 through PP-40, PP-79  
) through PP-85

**REPLY COMMENTS OF  
ROCK HILL TELEPHONE COMPANY,  
FORT MILL TELEPHONE COMPANY,  
AND LANCASTER TELEPHONE COMPANY**


M. John Bowen, Jr.  
John W. Hunter

MCNAIR LAW FIRM, P.A.  
1155 Fifteenth Street, N.W.  
Washington, D.C. 20005  
(202) 659-3900

Attorneys for Rock Hill Telephone  
Company, Fort Mill Telephone  
Company, and Lancaster Telephone  
Company

January 8, 1993

No. of Copies rec'd  
List A B C D E



## TABLE OF CONTENTS

	<u>PAGE</u>
SUMMARY	i
I. The definition PCS should embrace specific technological developments that distinguish this service offering from others.	2
II. Local exchange carrier eligibility to provide PCS should be fostered and not restricted in any way.	4
A. The Commission's objectives for PCS will be supported by local exchange carrier participation.	4
B. Cellular interests of local exchange carriers, particularly minority holdings, should not inhibit PCS eligibility.	5
C. A spectrum reserve should be created for all local exchange carriers operating in RSAs.	7
D. The frequency allocation for local exchange carrier provision of PCS should be the same as for other licensed PCS providers.	9
III. PCS serving areas should follow MSA and RSA designation, but national licenses should also be considered under the right conditions.	10
IV. Conclusion	11

## SUMMARY

Rock Hill Telephone Company, Fort Mill Telephone Company and Lancaster Telephone Company ("Rock Hill") continue to assert the need for adoption of a Personal Communications Service ("PCS") definition that is broad enough to encompass new technologies but specific enough to distinguish it from other mobile service offerings. Rock Hill also maintains that five licensed channel sets of 20 MHz each be allocated for all service areas.

The record in this proceeding supports full local exchange carrier service eligibility to provide PCS. Such participation should be fostered and not restricted in any way. Further, a local exchange carrier's cellular interests, particularly minority holdings, should not adversely affect PCS eligibility. With regard to spectrum, Rock Hill believes that the record supports the allocation of a reserve for local exchange carriers serving RSAs for use within their service areas and that the frequency allocation for local exchange carrier provision should be the same as for other PCS licensees.

Rock Hill contends that the record supports the adoption of MSA and RSA designations for PCS serving areas. Rock Hill continues to support MSA and RSA markets, but would not oppose the concurrent use of national licenses if certain conditions are included. They are that national licenses include local participation, that local exchange carriers be allowed to participate and with no adverse impact to the national license applicant, and that the licensees be selected by a modified comparative hearing process.

RECEIVED

JAN - 8 1993

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

RECEIVED  
JAN - 8 1993

In the Matter of	)	GEN Docket No. 90-314
	)	ET Docket No. 92-100
	)	
	)	RM-7140, RM-7175, RM-7617,
	)	RM-7618, RM-7760, RM-7782,
Amendment of the Commission's	)	RM-7860, RM-7977, RM-7978,
Rules to Establish New Personal	)	RM-7979, RM-7980
Communications Services	)	
	)	PP-35 through PP-40, PP-79
	)	through PP-85

**REPLY COMMENTS OF  
ROCK HILL TELEPHONE COMPANY,  
FORT MILL TELEPHONE COMPANY,  
AND LANCASTER TELEPHONE COMPANY**

Rock Hill Telephone Company, Fort Mill Telephone Company, and Lancaster Telephone Company (hereinafter jointly referred to as "Rock Hill") hereby submit their reply comments in the captioned proceeding. Throughout this Personal Communications Services ("PCS") proceeding, and particularly in its Comments, Rock Hill has advocated that the Commission adopt a definition of PCS that distinguishes it from other services, that local exchange carriers be able to fully participate in the provision of PCS in their local exchange service areas, and that they not be precluded from such participation by virtue of any cellular holdings they might have. In order to realize the public interest benefits of exchange carrier provision of PCS, Rock Hill has advocated that a spectrum reserve of one of the

licensed spectrum blocks be created for the local exchange carriers serving Rural Service Areas ("RSAs"). Rock Hill has also maintained that PCS service areas should adhere to the Metropolitan Statistical Area ("MSA") and RSA boundaries in order to assure PCS deployment to both metropolitan and non-metropolitan areas of the country.

The record for adopting these policies advocated by Rock Hill has been more firmly established by the comments submitted. Rock Hill continues to urge the Commission to promulgate rules for PCS that include an expansive service definition, local exchange carrier eligibility, a spectrum reserve for local exchange carriers serving RSAs, allocation of five licensed channel sets of 20 MHz each in every service area, along with unlicensed spectrum for wideband and narrowband applications, and licensing areas that follow MSA and RSA boundaries. Rock Hill would continue to oppose national licenses unless the Commission provided for full participation by local exchange carriers or a consortium thereof.

**I. The definition of PCS should embrace specific technological developments that distinguish this service offering from others.**

Rock Hill advocated the inclusion of specific characteristics in the Commission's PCS definition that would distinguish it from other mobile service offerings, particularly cellular.<sup>1</sup> Other parties, in taking similar positions, pointed out that the Commission has an obligation to encourage new technologies and

---

<sup>1</sup>Comments of Rock Hill, pp. 2-3.

services in order to enhance the competitiveness of the United States, by virtue of Section 7 of the Communications Act, 47 U.S.C. §157.<sup>2</sup> The Commission will fulfill this statutory obligation if it adopts rules that specifically propose the unique technical characteristics of PCS and encourage their development. In preparing to utilize spectrum for PCS in the Emerging Technologies proceeding,<sup>3</sup> the Commission recognized the need for spectrum to develop new services and thereby ensure the nation's future competitiveness. The Commission should carry through on this finding and assure that this spectrum is, in fact, used for new technology and service to the public in accordance with Section 7 of the Act. Otherwise, if a broad definition of PCS is adopted, the Commission will only be allocating spectrum and adopting rules for a service that can be classified as nothing more than a "cellular-clone."<sup>4</sup> Throughout the Commission's Office of Plans and Policy working paper, Putting It All Together: The Cost Structure of Personal Communications Services ("OPP Paper"),<sup>5</sup> the differences between cellular and PCS were specifically recognized. These differences should be embodied in the definition that the Commission adopts for PCS.

---

<sup>2</sup>See Comments of BellSouth, p. 2. See also Comments of Rock Hill to the Notice of Inquiry in this proceeding filed on October 1, 1990.

<sup>3</sup>First Report and Order and Third Notice of Proposed Rulemaking, General Docket No. 92-9, FCC 92-437, released October 16, 1992.

<sup>4</sup>Comments of BellSouth, p. 67.

<sup>5</sup>David P. Reed, Working Paper No. 28, Office of Plans and Policy, FCC, November 1992.

**II. Local exchange carrier eligibility to provide PCS should be fostered and not restricted in any way.**

Not only have Rock Hill and other local exchange carriers advocated full participation by local exchange carriers in PCS, but also a wide representation of non-exchange carrier interests have supported local exchange carrier participation in PCS as being in the public interest.<sup>6</sup> In fact, the OPP Paper specifically acknowledged the benefits to the consumer that would result from full local exchange carrier participation in PCS.<sup>7</sup>

The comments of those parties arguing against local exchange carrier participation are unpersuasive and do not constitute a record for the Commission to restrict in any way a local exchange carrier's eligibility to provide PCS. Rather, an adequate basis has been developed for allowing exchange carrier participation, which will assure that the benefits of such participation are realized by the public. Therefore, the record in this proceeding demonstrates that local exchange carrier provision of PCS is in the public interest.

**A. The Commission's objectives for PCS will be supported by local exchange carrier participation.**

In its Comments, Rock Hill set forth how the Commission's stated objectives

---

<sup>6</sup>See, e.g., Comments of Hughes Network Systems, p. 7, Northern Telecom, P. 28, Telmarc Telecommunications, p. 34, Interdigital, p. 12, Fleet Call, fn. 27, Telocator, p. 6, Century Cellnet, p. 8, Florida Cellular RSA Limited Partnership, pp. 9-11, New York Department of Public Service, p. 8, and Chief Counsel for Advocacy of the Small Business Administration, p. 22.

<sup>7</sup>OPP Paper, supra at v, 56.

for PCS would be furthered by local exchange carrier participation.<sup>8</sup> Many other carriers also explained how the Commission's objectives of universality, speed of deployment, diversity, and competitive delivery would be served by exchange carrier provision of PCS.<sup>9</sup> This record is substantial and unrefuted.

**B. Cellular interests of local exchange carriers, particularly minority holdings, should not inhibit PCS eligibility.**

While not opposing local exchange carrier eligibility, a number of parties argued that any ownership interest of cellular systems should act as a bar to PCS participation.<sup>10</sup> Such arguments are without merit and are merely thinly veiled

---

<sup>8</sup>Comments of Rock Hill, pp. 6-9.

<sup>9</sup>Comments of Anchorage Telephone Utility, pp. 1-4, Ameritech, pp. 13-17, Alltel, pp. 8-12, Bell Atlantic, pp. 12-14, BellSouth, pp. 49-55, Concord Telephone Company, p. 4, Small Rural Virginia Telcos, pp. 1-2, Centel Corporation, pp. 17-20, Cincinnati Bell Telephone Company, pp. 3-8, Clear Creek Mutual Telephone Company, et al., pp. 6-7, GTE Corporation, pp. 42-49, Home Telephone Company, pp. 3-6, Lincoln Telephone and Telegraph Company, pp. 6-8, NYNEX Corporation, pp. 8-17, National Telephone Cooperative Association, pp. 3-11, National Rural Telecom Association and Organization for the Protection and Advancement of Small Telephone Companies, pp. 5-6, 13-15, Pacific Telesis, pp. 10-14, Palmetto Rural Telephone Cooperative, Inc., pp. 3-6, Piedmont Rural Telephone Cooperative, Inc., et al., p. 2, Puerto Rico Telephone Company, pp. 1-2, Rochester Telephone Corporation, pp. 7-12, Rural Independent Coalition, pp. 4-13, South Carolina Telephone Association, pp. 5-8, 10-11, Southern New England Telecommunications Corporation, pp. 3-6, Southwestern Bell Corporation, pp. 13-18, Telephone and Data Systems, Inc., pp. 13-19, US West, Inc., pp. 22-35, United States Telephone Association, pp. 8-15.

<sup>10</sup>See, e.g., Comments of Adelphia Communications Corp., p. 11, People of the State of California and the Public Utilities Commission of the State of California, p. 2, National Telecommunications and Information Administration, pp. 25-32, Pass Word, Inc., p. 6, Pennsylvania Public Utility Commission, pp. 4-6, Rolm, pp. 24, 26-27, Swayzee Telephone Company, p. 4, Telmarc Telecommunications, Inc., pp. 28-36, U.S. Department of Justice, p. 29.

attempts to exclude a substantial number of local exchange carriers from PCS. The very reasons that support local exchange carrier participation establish a substantial record to rebut these arguments. Adoption of a restriction would be especially severe on smaller local exchange carriers, such as Rock Hill, who have minority interests in cellular systems.<sup>11</sup> Those companies exercise no control or management over the cellular systems. Also, in many of the instances where a local exchange carrier has a minority interest in a cellular system, that system does not actually provide service in the exchange carrier's serving area. In any event, local exchange carriers with minority cellular interests do not have the access to cellular frequencies that would allow them to offer any wireless service to their customers.

In addition, Rock Hill agrees that persuasive arguments have been advanced in this proceeding that would justify allowing cellular carriers in general to offer PCS. In particular, the Cellular Telecommunications Industry Association ("CTIA") argued that market considerations do not justify excluding cellular providers from PCS and that substantial technical limitations would adversely affect cellular companies' ability to provide PCS over cellular frequency.<sup>12</sup> At the threshold of the argument for cellular eligibility is the fact that cellular and PCS characteristics are different and, therefore, the services are different. The OPP Study recognizes these differences, particularly that cellular and PCS will likely develop as two distinct

---

<sup>11</sup>See Comments of Rock Hill, p. 10.

<sup>12</sup>Comments of CTIA, pp. 63-67.

networks with distinct characteristics.<sup>13</sup> In addition, current cellular frequency allocations will not be capable of supporting PCS without diluting the capabilities of both services. Both services should be fully developed and with unrestricted eligibility. These arguments support both general cellular eligibility for PCS and eligibility of local exchange carriers with minority cellular interests. Regardless of whether the Commission allows cellular participation, Rock Hill does not believe that local exchange carrier ownership of cellular interests should preclude exchange carrier participation.

**C. A spectrum reserve should be created for all local exchange carriers operating in RSAs.**

Rock Hill advocated that a spectrum reserve be established in RSAs for local exchange carriers to offer PCS in their own exchange areas, particularly in order that smaller local exchange carriers be enabled to continue to fulfill their universal service obligations.<sup>14</sup> A number of other parties similarly advocated a mechanism by which local exchange carriers could offer PCS.<sup>15</sup> The reasons for doing so are persuasive and constitute an adequate record for the Commission to enact such a

---

<sup>13</sup>OPP Paper, p. 65.

<sup>14</sup>Comments of Rock Hill, pp. 11-12.

<sup>15</sup>See Comments of Centel, p. 20, City Utilities of Springfield, Missouri, p. 11, Chesnee Telephone Company, p.1, Home Telephone Company, pp. 8-10, The Lincoln Telephone & Telegraph Company, p. 2, The National Rural Telecom Association, pp. 13-15, National Telephone Cooperative Association, p. 4, Northern Telecom, p. 31, Palmetto Rural Telephone Cooperative, Inc., pp. 8-9, Piedmont Rural Telephone Cooperative, Inc., et al., p. 2, Roseville Telephone Company, pp. 6-7, Rural Cellular Corporation, p. 3, The South Carolina Telephone Association, pp. 10-11, U.S. Telephone Association, pp. 22-27, Utilities Telecommunications Council, p. 34.

proposal.

One party, Cablevision Systems Corporation, ("Cablevision"), advocates that cable television systems be awarded a PCS license set-aside, on the basis that cable systems are an "obvious choice" for supplying the connections between PCS cells.<sup>16</sup> While Rock Hill does not oppose Cablevision's proposal, the reasons for supporting a reserve for local exchange carriers are more compelling. Curiously, Cablevision opposes treatment for local exchange carriers similar to that advocated by Rock Hill.<sup>17</sup> Typical of the arguments supporting such a position are that many local exchange carriers hold cellular licenses, that local exchange carriers already have "control of local bottleneck facilities," and that they would have incentives to favor their own PCS affiliate at the expense of other PCS providers.<sup>18</sup>

The argument regarding local exchange carrier interests of cellular has already been addressed. See pp. 5-7, supra. Similarly, the concern over control of "bottleneck" facilities is not relevant for two reasons. First, local exchange carriers recognize that they will need to implement new technologies in order to survive and to continue to fulfill their universal service obligations. PCS embodies one of those technologies. Second, sufficient safeguards are already in place to alleviate any anticompetitive concerns. Even the OPP Paper, which raises unfounded concerns about interconnection arrangements provided by local exchange carriers to PCS

---

<sup>16</sup>Comments of Cablevision, pp. 13-14.

<sup>17</sup>Id. at 14.

<sup>18</sup>Id. at 14-15.

providers, acknowledges the benefits of local exchange carrier provision of PCS and advocates the use of adequate safeguards.<sup>19</sup> The speculation about telephone company practices regarding interconnection in new services has always proven to be unfounded. Since no evidence exists concerning exchange carrier actions directed at restricting competition, no basis exists upon which to limit their participation. The nonstructural safeguards and nondiscriminating interconnection provisions that currently apply to all local exchange carriers are sufficient to address any concerns regarding local exchange carrier provision of PCS in their exchange service areas.

**D. The frequency allocation for local exchange carrier provision of PCS should be the same as for other licensed PCS providers.**

Rock Hill advocated that the Commission allocate five 20 MHz channel sets for PCS and that one such channel set be utilized for the reserve for local exchange carrier provision of PCS in RSAs. The suggestions have been made that either only 10 MHz be allocated for local exchange carrier use<sup>20</sup> or an unlicensed portion be used.<sup>21</sup> The record does not support a different amount or type of spectrum for local exchange carrier provision of PCS than for any other provider. The type of service offered by a local exchange carrier would be the same. A lesser amount of spectrum or unlicensed spectrum would not provide the appropriate level of service and would therefore not be in the public interest.

---

<sup>19</sup>OPP Paper, pp. 59-60.

<sup>20</sup>Comments of Utilities Telecommunications Council, pp. 22-23, Advanced Cordless Technologies, Inc., p. 7.

<sup>21</sup>Comments of Pass Word, Inc., p. 7.

Yet other parties have suggested additional allocations of spectrum for utility and local government PCS use<sup>22</sup> or private, internal, non-commercial uses.<sup>23</sup> These requests should not be granted because the limited amount of spectrum that is available should be used for the greatest public good by companies serving the general public. It would not be in the public interest for the Commission to allocate additional spectrum to private, non-commercial users or to governmental units.

**III. PCS serving areas should follow MSA and RSA designation, but national licenses should also be considered under the right conditions.**

Rock Hill advocated the adoption of MSA and RSA designations for PCS serving areas on the basis that they best acknowledge the differences between metropolitan and non-metropolitan areas, encourage competition, and result in speedy deployment of PCS to non-metropolitan and less economically developed areas.<sup>24</sup> A substantial number of other parties shared Rock Hill's views.

Several parties also suggested nationwide licensing, including local participation in the provision of the service. If certain conditions are met, Rock Hill would not oppose the use of national licenses in conjunction with MSA and RSA licenses. The first condition is that it must include local participation. The second is that local exchange carriers be allowed to fully participate, including furnishing service within their exchange service areas, and regardless of their cellular interests.

---

<sup>22</sup>Comments of City Utilities of Springfield, Missouri, pp. ii, 10-12.

<sup>23</sup>Comments of Utilities Telecommunications Council, pp. 22-23.

<sup>24</sup>Comments of Rock Hill, pp. 5-6.

Local exchange carriers not only should be allowed to participate, but also their participation should not negatively impact the national licensee's eligibility in any way. Such local exchange carrier participation would also meet the Commission's four objectives set forth on page 2, supra. Third, the national licenses should be awarded on the basis of a modified comparative hearing process.

The proper implementation of two national licenses could result in deployment of PCS to both metropolitan and non-metropolitan areas quickly and efficiently, in economies of scale, and in development and adoption of common technical standards. The accomplishment of these goals for PCS deployment could therefore be achieved by use of both properly structured national licenses and MSA and RSA licenses.

#### **IV. Conclusion**

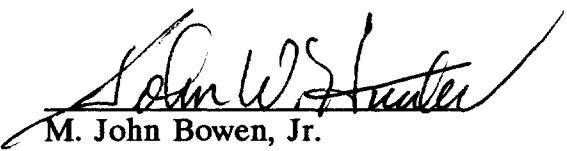
Rock Hill continues to advocate that the Commission adopt PCS policies that include a definition for PCS that is broad enough to encompass new technologies but specific enough to distinguish it from other mobile service offerings. Also, Rock Hill advocates that five licensed channel sets of 20 MHz each be allocated for all service areas. Rock Hill further urges the Commission to provide for local exchange carrier eligibility regardless of cellular interests, including a full spectrum reserve for local exchange carriers serving RSAs for use within their exchange service areas. Finally, Rock Hill advocates the adoption of MSA and RSA service areas, and

would not oppose nationwide licenses if local exchange carriers are allowed to fully participate.

Respectfully submitted,

ROCK HILL TELEPHONE COMPANY  
FORT MILL TELEPHONE COMPANY  
LANCASTER TELEPHONE COMPANY

By:

  
M. John Bowen, Jr.  
John W. Hunter

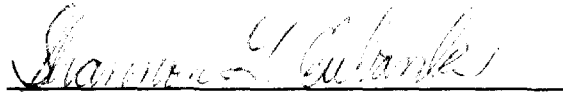
McNair Law Firm, P.A.  
1155 Fifteenth Street, N.W.  
Washington, D.C. 20005  
(202) 659-3900

Their Attorneys

January 8, 1993

**CERTIFICATE OF SERVICE**

I, Shannon G. Eubanks, hereby certify that a copy of the foregoing Reply Comments of Rock Hill Telephone Company, Fort Mill Telephone Company, and Lancaster Telephone Company was mailed, postage prepaid, first-class United States mail, this eighth day of January, 1993, to the parties on the attached list.

  
\_\_\_\_\_

Shannon G. Eubanks

Steven Stutman  
Metriplex, Inc.  
25 First Street  
Cambridge, MA 02141

Mark R. Hamilton  
Scott K. Morris  
McCaw Cellular Communications, Inc.  
5400 Carillon Point  
Kirkland, WA 98033

Michael D. Kennedy  
Stuart E. Overby  
Motorola, Inc.  
1350 I Street, N.W., Suite 400  
Washington, D.C. 20005

George Petrutsas  
Fletcher, Heald & Hildreth  
1225 Connecticut Ave., N.W.  
Suite 400  
Washington, D.C. 20036

Richard E. Wiley  
R. Michael Senkowski  
David E. Hilliard  
Eric W. DeSilva  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

John S. Fischer  
LCC Incorporated  
2300 Clarendon Boulevard, Suite 800  
Arlington, VA 22201

Lourens Van Der Jagt  
Knowledge Implementations, Inc.  
32 Conklin Road  
Warwick, NY 10990

Benn Kobb  
The Wireless Information Networks  
Forum  
1155 Connecticut Avenue N.W., Ste. 500  
Washington, D.C. 20036

Edward Schor  
Viacom International Inc.  
1515 Broadway  
New York, NY 10036

Paul Rodgers  
National Association of Regulatory  
Utility Commissioners  
1101 ICC Building  
Post Office Box 684  
Washington, D.C. 20044

William J. Cowan  
New York Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223

Thomas P. Kerester,  
Office of Advocacy  
United States Small Business  
Administration  
409 3rd Street, S.W.  
Washington, DC 20416

Richard L. Rosen  
U.S. Department of Justice  
Room 8104  
Judiciary Center Building  
555 Fourth Street, N.W.  
Washington, D.C. 20001

Jeffrey L. Sheldon  
Utilities Telecommunications Council  
1140 Connecticut Avenue, N.W.  
Suite 1140  
Washington, D.C. 20036

Lorinda Ackley  
Taconic Telephone Corp.  
Old Route 22  
Copake, NY 12516

Thomas A. Stroup  
Telocator  
1019 19th St., N.W.  
Suite 1100  
Washington, D.C. 20036

Dr. Donald L. Schilling  
InterDigital Communications Corp.  
85 Old Shore Road  
Suite 200  
Port Washington, NY 11050

Darrell S. Townsley  
Illinois Commerce Commission  
160 North LaSalle St.  
Suite C-800  
Chicago, IL 60601

F. Thomas Tuttle  
Suite 700  
1615 M Street N.W.  
Washington, D.C. 20036

Brice L. Clark  
Hewlett-Packard Company  
8000 Foothills Blvd.  
Roseville, CA 95678

Michael L. Glaser  
Hopper & Kanouff, P.C.  
1610 Wynkoop, Suite 200  
Denver, CO 80202-1196

Lawrence M. Miller  
Schwartz, Woods & Miller  
Suite 300  
The Dupont Circle Building  
1350 Connecticut Ave., N.W.  
Washington, D.C. 20036

David L. Hill  
O'Connor & Hannan  
1919 Pennsylvania Avenue, N.W.  
Suite 800  
Washington, D.C. 20006

Dinah D. McElfresh  
Electromagnetic Energy Policy Alliance  
1255 Twenty-Third Street, NW  
Suite 850  
Washington, D.C. 20037-1174

Fred I. Denny  
Edison Electric Institute  
701 Pennsylvania Ave., N.W.  
Washington, D.C. 20004

Brenda L. Fox  
Raymond G. Bender, Jr.  
Dow, Lohnes & Albertson  
1255 Twenty-third Street, N.W.  
Suite 500  
Washington, D.C. 20037

Daryl L. Avery  
Public Service Commission  
of the District of Columbia  
450 Fifth Street, N.W.  
Washington, D.C. 20001

Wayne V. Black  
Shirley S. Fujimoto  
Keller and Heckman  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Gerald S. McGowan  
Elizabeth R. Sachs  
Lukas, McGowan, Nace & Gutierrez  
1819 H Street, N.W., Suite 700  
Washington, D.C. 20006

John D. Lockton  
Corporate Technology Partners  
520 S. El Camino Real  
Suite 715  
San Mateo, CA 94402

Cheryl Lynn Schneider  
Communications Satellite Corporation  
950 L'Enfant Plaza, S.W.  
Washington, D.C. 20024

David Lemon, P.E.  
CNet, Inc.  
4975 Preston Park Blvd., 8th Floor  
Plano, TX 75093

William E. Kennard  
Verner, Liipfert, Bernhard  
McPherson and Hand, Chartered  
901 15th Street, N.W.  
Suite 700  
Washington, D.C. 20005

Peter A. Casciato  
Cellular Service, Inc.  
1500 Sansome Street Suite 201  
San Francisco, CA 94111

Chandos A. Rypinski  
LACE, Inc.  
655 Redwood Highway #340  
Mill Valley, CA 94941

Ellen S. Deutsch  
Citizens Utilities Company  
of California  
P.O. Box 496020  
Redding, CA 96049-6020

Albert H. Frazier, Jr.  
CELSAT Inc.  
879 W. 190th Street Suite 400  
Gardena, CA 90248

Peter Arth, Jr.  
Public Utilities Commission of the  
State of California  
505 Van Ness Avenue  
San Francisco, CA 94102

H. Mark Gibson  
COMSEARCH  
11720 Sunrise Valley Drive  
Reston, VA 22091

Robert J. Miller  
Alcatel Network Systems, Inc.  
1601 Elm Street, Suite 3000  
Dallas, TX 75201

Marv Hirschberg  
Advanced Cordless Technologies, Inc.  
150 River Road  
Bldg. O  
Montville, NJ 07045

Robert B. Kelly  
Law Office of Robert B. Kelly , P.C.  
Suite 660  
1920 N Street, N.W.  
Washington, D.C. 20036

James Gunn  
Andrew Corporation  
1850 North Greenville  
Suite 100  
Richardson, TX 75081

Alan R. Shark  
American Mobile Telecommunications  
Association, Inc.  
1835 K Street N.W., Suite 203  
Washington, D.C. 20006

Bruce D. Jacobs  
Fisher, Wayland, Cooper & Leader  
1255 23rd Street, N.W.  
Suite 800  
Washington, D.C. 20037

Lon C. Levin  
AMSC Subsidiary Corporation  
1150 Connecticut Avenue, N.W.  
Fourth Floor  
Washington, D.C. 20036

Wayne N. Schelle  
American Personal Communications  
2212 Old Court Rd.  
Baltimore, MD 21208-3432

Aaron I. Fleischman  
Stuart F. Feldstein  
Robert J. Keller  
Fleischman and Walsh  
1400 Sixteenth Street, N.W.  
Washington, D.C. 20036

C.E. Baker  
Arch Communications Group, Inc.  
1800 West Park Drive  
Suite 250  
Westborough, MA 01581

John D. Lane  
Wilkes, Artis, Hedrick & Lane,  
Chartered  
1666 K Street, N.W.  
Washington, D.C. 20006

Kevin J. Kelley  
QUALCOMM Incorporated  
2000 L Street, N.W., Suite 702  
Washington, D.C. 20036

John Q. Hearne  
100 Wilshire Blvd., Suite 1000  
Santa Monica, CA 909401

Russell H. Fox  
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Suite 900, East Tower  
Washington, D.C. 20005

Ellen M. Averett  
Counsel for Pennsylvania  
Public Utility Commission  
P.O. Box 3265  
G-28 North Office Building  
Harrisburg, PA 17105-3265

Stephen Kaffee  
Law Office of Stephen Kaffee, P.C.  
1920 N Street, N.W.  
Suite 660  
Washington, D.C. 20036

William S. Moorhead  
Pulson Communications Corporation  
8280 Greensboro Drive  
Suite 500  
McLean, VA 22102-3807

A. Thomas Carroccio  
Santarelli, Smith & Carroccio  
Ninth Floor  
1155 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Gardner F. Gillespie  
Hogan & Hartson  
555 13th Street N.W.  
Washington, D.C. 20004

Judith St. Ledger-Roty  
Reed Smith Shaw & McClay  
1200 18th Street, N.W.  
Washington, D.C. 20036

Thomas E. Martinson  
PCN America, Inc.  
153 East 53rd Street  
Suite 2500  
New York, NY 10022

Mark Stachiw  
PactTel Paging  
Three Forest Plaza  
12221 Merit Drive  
Suite 800  
Dallas, TX 75251

Carl W. Northrop  
Suite 700  
700 Thirteenth St., N.W.  
Washington, D.C. 20005

Jeffrey Blumenfeld  
Blumenfeld & Cohen  
1615 M Street N.W. Suite 700  
Washington, D.C. 20036

Rodney J. Bacon  
Pass Word, Inc.  
1303 W. First Ave.  
Spokane, WA 99204

Alden F. Abbott  
National Telecommunications and  
Information Administration  
U.S. Department of Commerce  
Room 4713  
14th and Constitution Ave., N.W.  
Washington, D.C. 20230

Henry L. Baumann  
National Association of Broadcasters  
1771 N Street, N.W.  
Washington, D.C. 20036

Paul J. Sinderbrand  
Albert H. Kramer  
Keck, Mahin & Cate  
1201 New York Avenue, NW  
Washington, D.C. 20005

S. M. Samuels  
Swayzee Telephone Company  
103 West Mark Street  
Swayzee, IN 46986

Charles D. Ferris  
Mintz, Levin, Cohn, Ferris,  
Glovsky & Popeo, P.C.  
701 Pennsylvania Ave., N.W.  
Suite 900  
Washington, D.C. 20004

Philip L. Verveer  
Willkie Farr & Gallagher  
1155 21st Street, N.W.  
Suite 600  
Washington, D.C. 20036-3384

Larry A. Blosser  
MCI Telecommunications Corporation  
1801 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

Francine J. Berry,  
AT&T  
295 North Maple Avenue  
RM 3244J1  
Basking Ridge, NJ 07920

Thomas J. Casey,  
Skadden, Arps, Slate, Meagher &  
Flom  
1440 New York Avenue, N.W.  
Washington, D.C. 20005

Mr. Hollis G. Duensing  
General Solicitor  
Assn. of American Railroads  
50 F Street, N.W.  
Washington, D.C. 20001

Robert S. Foosaner,  
Jones, Day, Reavis & Pogue  
1450 G Street, N.W.  
Washington, D.C. 20005-2088

David C. Jatlow,  
Young & Jatlow  
2300 N Street, N.W.  
Suite 600  
Washington, D.C. 20037

Mr. Jeffrey Krauss  
Consultant  
15200 Shady Grove Road  
Suite 450  
Rockville, MD 20850

Andrew D. Lipman,  
Swidler & Berlin  
3000 K Street, N.W.  
Washington, D.C. 20007

Mr. John E. McNulty  
President & CEO  
Rose Communications, Inc.  
2390 Walsh Avenue  
Santa Clara, CA 95051

John W. Pettit  
Hopkins & Sutter  
888 16th Street, N.W.  
Washington, D.C. 20006

Mr. Eric J. Schimmel  
Vice President  
Telecomm. Industry Assoc.  
2001 Pennsylvania Ave., N.W.  
Suite 800  
Washington, D.C. 20006-1813

David E. Weisman,  
Meyer, Faller, Weisman &  
Rosenburg, P.C.  
4400 Jenifer St., N.W.  
Suite 380  
Washington, D.C. 20015

Robert L. Vasquez  
Anchorage Telephone Utility  
600 Telephone Avenue  
Anchorage, AK 99503

Robert N. Reiland  
Ameritech  
30 South Wacker Drive  
Suite 3900  
Chicago, IL 60606

Carolyn C. Hill  
ALLTEL Service Corporation  
1701 Rhode Island Ave., N.W.  
Suite 1000  
Washington, D.C. 20036

Mark S. Fowler  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, D.C. 20004

William B. Barfield  
BellSouth Corporation  
1155 Peachtree Street, N.E.  
Atlanta, GA 30367-6000

Barry R. Rubens  
The Concord Telephone Company  
68 Cabarrus Avenue, East  
P.O. Box 227  
Concord, NC 28026

James S. Quarforth  
President  
Clifton Forge-Waynesboro  
Telephone Company  
P.O. Box 1990  
Waynesboro, VA 22980

Charles F. Wright  
CENTEL Corporation  
8725 Higgins Road  
Chicago, IL 60631